



June 11, 2007

VIA CERTIFIED MAIL

Ms. Mary Logan
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604

RUTGERS Organics Corporation

**Re: NEASE CHEMICAL SITE, SALEM, OHIO
- PRE-DESIGN INVESTIGATION AND REMEDIAL DESIGN
SCHEDULE -**

Dear Mary:

As requested, this letter addresses the schedule for upcoming deliverables required by the Pre-Design Investigation (PDI) Work Plan for the above site.

Three Technical Memoranda are required by the approved Work Plan:

- Baseline Conditions Memorandum;
- Stripping/solidification/stabilization (S/S/S) Pilot Study Memorandum;
- Nano-scale zero valent iron (nZVI) Pilot Study and Collection Trench Study Memorandum

Following completion of these Technical Memoranda, the Remedial Design Work Plan (RDWP) is to be submitted as required by the Administrative Order on Consent.

As you know, RUTGERS Organics Corporation (ROC) and its consultants have been working very closely with the U.S. Environmental Protection Agency (USEPA) and the Ohio Environmental Protection Agency (Ohio EPA) throughout the conduct of the PDI Work to ensure that all of the information necessary to complete the design is collected. This cooperation included weekly conference calls during the conduct of the fieldwork to share data and agree on the scope of follow-up activities. The data obtained led the Agencies/ ROC team to agree on the need to expand or modify the scope of several of the PDI tasks, including:

- The southern area shallow groundwater investigation expanded to include over 30 wells, implemented in four phases, rather than the single phase of seven wells originally scoped;

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- An off-property soil vapor investigation was added as a result of the shallow groundwater data findings. This necessitated securing off-property access agreements, contracting an additional laboratory, and conducting additional fieldwork;
- The analytical laboratory for soil mirex analyses was changed from Exygen to Ohio EPA. As a result, soil mirex analyses were received four months later than originally anticipated;
- The nZVI Pilot Study scope (additional well and tracer testing) and duration was extended to collect additional performance data;
- A laboratory biological treatability study, which was a contingent task in the PDI Work Plan, is being undertaken. This required preparation and Agencies' review of a Work Plan together with associated field sampling;
- An interim deliverable was prepared for the S/S/S Pilot Study that was reviewed by the Agencies' team.

Based upon these agreed scope modifications, ROC proposes the following revised schedule for the deliverables required by the PDI Work Plan:

- Baseline Conditions Memorandum, including the Collection Trench Study results: June 14, 2007;
- Stripping/solidification/stabilization (S/S/S) Pilot Study Final Memorandum: November 1, 2007;
- Nano-scale zero valent iron (nZVI) Pilot Study Memorandum, including the associated biological treatability study results: October 1, 2007.

It is anticipated that the Baseline Conditions Memorandum will recommend additional PDI Work. This work will be conducted in parallel with the completion of the Pilot Studies and, as provided in the PDI Work Plan, it is anticipated that the Remedial Design Work Plan would be submitted three months after completion of the final Pilot Study i.e. by February 1, 2008.

Please do not hesitate to contact Steve Finn or Golder Associates or myself if you have any questions regarding this matter.

Sincerely,


Dr. Rauner F. Domalski
Manager Remediation Projects

cc: Sheila Abraham, Ohio EPA
Steve Finn, Golder Associates